

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

MARGUERITE CARRUBBA,
Plaintiff,

VERSUS CIVIL ACTION NO: 1:07cv1238

HARRISON COUNTY, MISSISSIPPI,
by and through its Board of
Supervisors; HARRISON COUNTY
SHERIFF, George Payne;
WAYNE PAYNE; DIANE GATSON RILEY;
STEVE CAMPBELL; RICK GATSON;
RYAN TEEL; KARLE STOLZE;
WILLIAMS PRIEST; JAMES A.
GONDLES, JR; AMERICAN
CORRECTIONAL ASSOCIATION;
JOHN AND JANE DOES 1-3; HEALTH
ASSURANCE, LLC AND J.L. WHITE,
Defendants.

DEPOSITION OF KARL STOLZE

Taken at the offices of Dukes, Dukes,
Keating & Faneca, 2909 13th Street,
Sixth Floor, Gulfport, Mississippi, on
Tuesday, September 22, 2009, beginning
at 8:36 a.m.

REPORTED BY:

F. DUSTY BURDINE, CSR No. 1171
Simpson Burdine & Miguez
Post Office Box 4134
Biloxi, Mississippi 39535
dusty@SBMreporting.com
(228) 388-3130

SIMP

EXHIBIT

(28) 388-3130

"D"

1 A. No.

2 Q. Okay. And you pled guilty to one count
3 of conspiracy to deprive rights under color of
4 law; is that correct?

5 A. Yes.

6 Q. Tell me about that conspiracy. When did
7 it start and end?

8 A. Well, according to the plea agreement,
9 it started somewhere around August and ended in
10 January.

11 Q. Okay. Who were the co-conspirators?
12 Can you name them?

13 A. Just -- I don't know. Whoever was in
14 the trial, I suppose.

15 Q. Was George Payne a part of your
16 conspiracy?

17 A. Not that I can remember.

18 Q. Did he ever meet with you or tell you
19 what to do?

20 A. No.

21 Q. Okay. Was it a policy of the Harrison
22 County Jail that you knew about to abuse prisoners
23 for sport?

24 A. No.

25 Q. When did you first meet with the -- did

1 you meet with the FBI first or just DOJ
2 attorneys --

3 A. The attorneys.

4 Q. -- during the investigation?

5 A. I don't remember the date.

6 Q. How many times did you meet with them?

7 A. Twice.

8 Q. Did they tell you that you faced a long
9 time in jail?

10 A. Yes.

11 Q. Were they specific, like life or just
12 20, 30 years, or what did they actually tell you?

13 A. They were specific.

14 Q. What was that?

15 A. Life.

16 Q. So were you offered the possibility of
17 serving life in prison if you didn't agree to this
18 one count plea?

19 A. Yes.

20 Q. At the sentencing hearing, did the U.S.
21 Probation Department present any testimony or
22 documents regarding their recommendations on the
23 sentencing?

24 A. Only to the judge.

25 Q. Okay. Was it discussed in open court in